

SHER TREMONTE LLP

September 27, 2024

VIA ECF

Hon. Colleen McMahon
United States District Judge
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, NY 10007

Re: **United States v. Rui-Siang Lin,**
No. 24 Crim. 178 (CM)

Dear Judge McMahon:

I represent Rui-Siang Lin, the defendant in the above-referenced matter. I write to the Court to respectfully request permission to file *ex parte* and under seal a request for an exemption from the Protective Order. See ECF No. 11. To provide the basis for the requested exemption would reveal defense strategy and other information that cannot be disclosed to the government without compromising Mr. Lin's right to the effective assistance of counsel. Accordingly, I respectfully request permission to file the request *ex parte* and under seal. I am advised by the Clerk's Office that, should the Court grant this request, I should file the request in paper form in a sealed envelope. I will do so, unless the Court directs me to file it instead by fax, email or any other electronic means.

I appreciate the Court's consideration.

Respectfully submitted,

/s/Noam Biale
Noam Biale

Attorney for Rui-Siang Lin

cc: AUSA Ryan Finkel (by ECF)

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
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DATE FILED: 9/30/24

MEMO ENDORSED

9/30/2024
File the motion
under seal and direct
by the Clerk. Please
deliver a hard copy
(by email) to Mr.
O'Neill so we
can
work on
it.

W